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**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT/ARREST WARRANT**

I, Anthony A. Ambrose, being duly sworn, depose and state as follows:

**INTRODUCTION**

1. I am a Special Agent for the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) and have served in that capacity since September 29, 2016. I am currently assigned to the Norfolk Field Office and charged with investigating violations of federal firearms, explosives, and arson laws. I am a graduate of both the Criminal Investigator Training Program and the ATF National Academy where I received special training in alcohol, tobacco, firearms, arson, explosives, and narcotic related crimes.

2. Prior to that, I worked for the Chesterfield County Police Department for over eight years, where I received training and investigated a wide variety of violations of Virginia state law, including firearm and narcotics related crimes. During my employment with the Chesterfield County Police Department, I served as a uniformed patrol officer, a vice and narcotics detective, a sergeant, and a tactical team operator with Special Weapons and Tactics (SWAT).

3. I make this affidavit in support of an application for an arrest warrant for BRIA SHAWNA BLOUNT for making a false statement on ATF Form 4473 during the acquisition of a firearm, in violation of Title 18, United States Code, Sections 924(a)(1)(a).

4. I became aware of the facts and circumstances described below through my personal observation during this investigation and through discussions with other members of state and federal law enforcement. I am submitting only those facts necessary to establish probable cause in this matter. This affidavit should not be construed as a complete statement of all the information generated from this investigation.

LRL

AMM

**FACTS SUPPORTING PROBABLE CAUSE**

5. On February 20, 2018, in connection with my investigation of a firearm that had recently been pawned at Superior Pawn and Gun in Norfolk, Virginia, I conducted a non-custodial consensual interview with BRIA BLOUNT at her residence in the 600 block of Mariners Way in Norfolk. During the interview, BLOUNT made several inconsistent statements with respect to the firearm pawned at Superior Pawn and Gun. She also stated that on February 17, 2018, she purchased a Glock handgun at the Norfolk, Virginia gun show. BLOUNT stated she did not presently have possession of the Glock, but was storing it at her brother's residence. According to BLOUNT, her brother, Dariel Tarrowwe Knight, is a convicted felon. BLOUNT also agreed that Knight would have access to the Glock handgun if he needed it for his protection.

6. During the interview, BLOUNT retrieved her cell phone and accessed photos and text messages that occurred between her and Knight around the time of the gun show. BLOUNT showed me several photos of firearms that were stored in her phone's photo log. When asked why she photographed the firearms, BLOUNT said she sent the pictures to Knight who was "telling her what to get." BLOUNT indicated she had very little knowledge about firearms and that Knight was helping her pick out the firearm.

7. I asked BLOUNT to pull up the text messages between herself and Knight, and she agreed, handing me her cell phone. (Knight was listed in her phone as "Yell.") As I looked through the text messages (in BLOUNT's presence), it was clear that she looked at several firearms before purchasing one that Knight wanted. Knight had previously sent several pictures of firearms to BLOUNT, and she responded that she was "looking for the ones u sent." BLOUNT also sent pictures of firearms from the gun show to Knight, who responded, "just get

that Glock 26.” After BLOUNT completed the purchase of a Glock Model 26, 9 mm semiautomatic pistol, serial #BELK754, she texted Knight that the total cost of the firearm was \$542.94 and that she purchased bullets as well. BLOUNT also indicated that she left the firearm “in the house,” and Knight responded, “Ok thanks I will get u straight later.”

8. After reviewing the text messages and photos, BLOUNT admitted (1) that she purchased the firearm for Knight and not for herself, (2) that after purchasing the Glock, she took it to Knight’s residence and placed it on a closet shelf, and (3) that was the last time she saw it. Finally, BLOUNT stated that Knight had given her \$500 cash to purchase the firearm and that she had to use some of her own money to supplement the additional cost of the firearm.

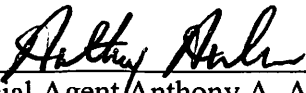
9. I contacted the Federal Firearms Licensee (FFL) who sold the firearm to BLOUNT, Liberty Manufacturing Group (LMG), and inquired about the purchase. The ATF Form 4473 was located and a digital image was provided to me. I reviewed the form, which indicated that on February 17, 2018, BLOUNT did in fact purchase the Glock firearm described above. Section 11(a) of the ATF Form 4473 inquired: “Are you the actual transferee/buyer of the firearm(s) listed on this form? **Warning: You are not the actual transferee/buyer if you are acquiring the firearm(s) on behalf of another person. If you are not the actual transferee/buyer, the licensee cannot transfer the firearm(s) to you.**” In response to question 11(a), BLOUNT checked “Yes,” indicating that she was the actual transferee/buyer of the firearm listed on the form, when in fact she was purchasing the firearm for her brother.

10. I requested a query of ATF’s records to verify that LMG was a valid FFL holder during the time of this transaction. This record was reviewed and confirmed that LMG was a valid FFL holder when BLOUNT purchased the Glock handgun and falsified the ATF Form 4473.

**CONCLUSION**

11. Based on the foregoing, I submit there is probable cause to believe that on February 17, 2018, in Norfolk, Virginia, in the Eastern District of Virginia, BRIA SHAWNA BLOUNT falsified a federal form (ATF Form 4473) during the acquisition of a firearm, in violation of Title 18, United States Code, Sections 924(a)(1)(a), and ask that an arrest warrant be issued.

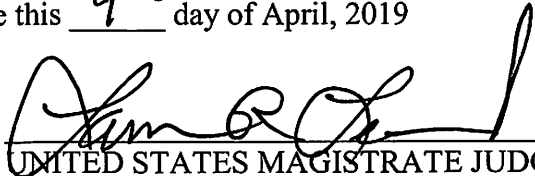
Further, your affiant sayeth naught.

  
Special Agent Anthony A. Ambrose  
Bureau of Alcohol, Tobacco, Firearms & Explosives

READ AND REVIEWED:

  
Sherrie S. Capotosto  
Assistant United States Attorney

Sworn and subscribed to before me this 9<sup>th</sup> day of April, 2019

  
UNITED STATES MAGISTRATE JUDGE

At Norfolk, Virginia